PRODUCT

Lambda Cyhalothrin Technical

STUDY TITLE

Waiver Request for Stability to Metals and Metal Ions

DATA REQUIREMENTS

OCSPP Test Guideline 830.6313

AUTHOR

Ailis Gregory

STUDY COMPLETION DATE

September 02, 2020

PERFORMING LABORATORY

N/A - No Analysis Performed

PROJECT ID

ALB20-6313

SPONSOR

Albaugh, LLC 1525 NE 36th Street Ankeny, IA 50021

STATEMENT OF DATA CONFIDENTIALITY CLAIMS

No claim of confidentiality is made for any information contained in this study on the basis of it falling within the scope of FIFRA Section 10 (d) (1) (A), (B) or (C).

Sponsor: Albaugh, LLC Sponsor's Agent: Ailis Gregory

Sponsor's Agent Title: Regulatory Manager, North America

Signature: ______ Date: ____ 2 Sept 2020

GOOD LABORATORY PRACTICE COMPLIANCE STATEMENT

This study is a presentation of descriptive information, and therefore, is not required to be conducted in compliance with the requirements of the Good Laboratory Practice regulations (40 CFR, Part 160).

Sponsor: Albaugh, LLC Sponsor's Agent: Ailis Gregory

Sponsor's Agent Title: Regulatory Manager, North America

Signature: Date: 2 Sept 2020

Submitter: Ailis B. Gregory

Submitter's Title: Regulatory Manager, North America

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OCSPP Test Guideline: 830.6313

Albaugh requests a waiver for a portion of guideline 830.6313 Stability to Normal and Elevated Temperatures, Metals, and Metal Ions.

Per EPA DER dated 8/31/2020 (D458442 & D458288), the guideline has been partially satisfied based on accelerated storage stability data submitted in MRID 51183602. However, the study did not discuss the lack of data for stability to metals and metal ions.

Albaugh request a waiver for the requirement for data on the Stability to Metals and Metal Ions because Lambda Cyhalothrin Technical is packaged in polyethylene drums and/or fiber drums. The product is not expected to come into contact with metals or metal ions.